GLENN SPRINGS HOLDINGS, INC.

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Mr. Syed Quadri
Western New York Remediation Section
Emergency and Remedial Response Division
United States Environmental
Protection Agency, Region II
290 Broadway, 20th Floor
New York, NY 10007-1866

Dear Mr. Quadri:

Re: Proposed Remedial Action Plan (PRAP)
Hooker Chemical/Ruco Polymer Corporation Site
Hicksville, New York

Glenn Springs Holdings, Inc. (GSHI) has reviewed the Proposed Remedial Action Plan (PRAP) issued on July 28, 2000 for the Hooker Chemicals/Ruco Polymer Site (Hooker/Ruco Site) located in Hicksville, New York. Overall, the PRAP provides an accurate summary of the conditions at and in the vicinity of the Site and of the remedial action alternatives evaluated for the vinyl chloride monomer (VCM) subplume. GSHI agrees with the preferred remedy selected by the EPA and for which concurrence from the New York State Department of Environmental Conservation (NYSDEC) has been given.

GSHI has the following specific comments/suggestions regarding the PRAP.

1. Remedial Investigation Summary, Third Paragraph, Fourth Sentence

   This sentence reads "In addition, available data indicate that several public supply wells from the Bethpage Water District have been affected by VOCs which are likely attributed to all three sites".

   Chemicals from the Hooker/Ruco Site could not have impacted the Bethpage Water District public supply wells located downgradient of the Northrop site. The Hooker/Ruco chemicals have not even reached halfway to the location of the Northrop IRM extraction wells and these wells are located approximately halfway to the Bethpage Water District public supply wells. Consequently, the chemicals from the Hooker/Ruco Site are less than one quarter of the distance to the Bethpage Water District public supply wells.

This sentence could stop after "VOCs" and would still accurately describe the VOC presence without attributing responsibility, which is a matter to be resolved among the PRPs.

2. Remedial Investigation Summary

It is agreed that metals are present in the groundwater beneath the Site. Arsenic and manganese did exceed their to-be-considered (TBC) criteria in the groundwater samples collected for the OU-1 Predesign Investigation. However, their exceedences of the criteria were limited to only a few wells and at concentrations only slightly above their published health standard criteria. Arsenic was present at up to 3.3 times the standard and manganese was present at up to 4.1 times the standard. Consequently, the presence of two metals in a few wells does not make metals a contaminant of concern at the Hooker/Ruco Site, especially when compared to the organic chemicals present.

3. Summary of Site Risks, Human Health Risk Assessment, Third Paragraph

The future exposure scenario is highly unlikely to occur, considering that:

i) a Nassau County ordinance permits obtaining drinking water only from a public supply source; and
ii) the public supply sources are being monitored and treatment implemented as needed.

This highly unlikely future exposure scenario should be reiterated so that public concerns regarding the estimated future residential groundwater use scenario risks are put in perspective.

4. There are many references in the PRAP for Alternative 1 that state that the Northrop IRM will exceed its air discharge limitations. This statement is based on the results of computer simulations that result in only simulated exceedences. Because of the uncertainty associated with such simulated results, it is suggested that text such as "could potentially exceed its air discharge limitations without the addition of supplemental treatment capability" be used.

5. Alternative 3: In-Situ Treatment of VCM Subplume by Bioremediation Using Biosparging - First Paragraph, Last Sentence

The text states that aerobic degradation of TCE and PCE is limited. While this is true for PCE , it is not correct for TCE. TCE degradation does readily occur under aerobic conditions, although not as quickly as occurs under anaerobic conditions. This sentence should be revised to reflect the different aerobic degradation rates for these two compounds.

6a. Comparative Analysis of Groundwater Remedial Alternatives - Compliance with ARARs. Second Paragraph, Second Last Sentence

It is believed that "not" should be inserted between "would" and "be required".

6b. Cost - First Sentence

A discount factor of 5 percent is stated as being used for the estimated present worth costs shown in this section. This should be corrected to 7 percent to be consistent with the discount rate of 7 percent shown in the section entitled "Summary of Groundwater Remediation Alternatives".

7. Preferred Alternative

The PRAP identifies Alternative 2 (pump and treat to groundwater ARARs) as the contingency remedy if in-situ biosparging is not effective. It is possible that during the time period of operation of the in-situ biosparging remedy, existing treatment technologies may become more effective or new effective technologies may be developed. Thus, rather than limiting the contingency remedy to a pump and treat system to meet ARARs, it is suggested that the text be rewritten so that the treatment technologies then available be evaluated to select the potentially most effective remedy applicable to the conditions existing at that time.

Given the more recent acknowledgement of the value of natural attenuation, it is also believed that it may not be necessary to pump and treat down to concentrations that meet ARARs. Some monitored natural attenuation may also be included as part of the contingency remedy. Thus an alternative to the specified contingency remedy is to pump and treat to remove a sufficient mass of VCM such that supplemental VCM treatment of the air discharge from the Northrop IRM would not be needed. This would then be consistent with the level of remediation effort proposed for the preferred remedial alternative.

Should you have any questions on the above, please do not hesitate to contact me at (859) 543-2151 or e-mail at steve_whyte@oxy.com.

Sincerely yours,

James Kay for

Steve Whyte
Project Manager

KDS/cm/6883/44
Encl.

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